



April 29, 2013

EPA Administrator  
US EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

Reference: Revised 30 Day Notification for Caulk Containing PCB's  
Kennesaw State University Student Recreation & Activities Center

Winter Environmental, a business unit of The Winter Construction Co., has been contracted by the Kennesaw State University Foundation to remove caulk containing polychlorinated biphenyls, analyzed at greater than 50 ppm, from exterior windows, doors, window frames and at various brick/brick joints and brick/concrete joints from the exterior of the building prior to renovation of the building by others.

Therefore, Winter Environmental provided notification to the EPA Region 4 on April 2, 2013 of our intent to provide remediation of the PCB caulks at this facility prior to renovation. The project is scheduled to commence 30 days from the date of the original 30 day notification. On April 18, 2013 Winter Environmental received notification from the EPA Region 4 that the original 30 day notification was incomplete and does not meet the requirements of 40 CFR § 761.61(a)(3). In particular, the approach to characterization and remediation of the PCB-contaminated porous substrates that are in contact with the PCB-contaminated caulk should be addressed in the notification.

The samples for analysis of PCB containing materials were taken by NOVA Engineering and Environmental of Kennesaw, GA and analyzed by Analytical Environmental Services, Inc. of Atlanta, GA (See attached survey and analytical information by NOVA.). NOVA Engineering and Environmental will provide clearance sampling of the adjacent porous substrates following Winter Environmental's remediation activities to confirm that porous substrates remaining in place adjacent to removed PCB caulks and impacted substrates, excluding structural concrete that cannot be removed without compromising the building's structural integrity, contain less than 1 ppm PCBs as required by the EPA. Porous substrate clearance sampling will be performed by NOVA in accordance with EPA approved standard operating procedure for sampling porous surfaces for PCBs.

As mentioned above, the caulk is located on windows, doors, and window frames as well as brick/brick joints and brick/concrete joints on the exterior of the building (See attached building plan.).

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The cleanup plan for the site is to:

- Regulate the work area with Danger tape and barricades to prevent access by others.
- Evacuate all building occupants from the affected areas.
- Install plastic sheeting on the interior of the building to create a seal over any openings to the outside.
- Place plastic sheeting on the ground to catch falling debris.
- Protect all HAZWOPER trained workers with appropriate PPE to include full body suits and gloves, steel toed boots and half face respirators with HEPA/organic vapor cartridges.
- Erect a decontamination area adjacent to the work area for decontamination of all tools, equipment and personnel.
- Remove all caulking and adjacent brick substrate from the southern portion of the building scheduled to become an interior wall during planned renovation activities.
- Remove all caulking and adjacent brick substrate from the entire western side of the building. The entire west side of the building is scheduled for demolition during renovation activities.
- Clean all areas of structural concrete that cannot be removed without compromising the structural integrity of the building.
- Provide air monitoring to ensure PEL's are not exceeded.
- Place caulk and contaminated brick substrate in DOT approved containers for transportation and disposal as bulk waste by Waste Management to Waste Management's Chemical Waste Management facility in Emelle, Alabama.
- NOVA will provide third party visual inspection of the work areas and substrate clearance sampling to ensure completion of removal and remediation activities
- Clean up areas and remove all containment systems.
  
- All remaining two-story exterior areas of the building not scheduled for renovation will be managed in place by an Operations and Maintenance Plan. The remaining areas of caulk will be encapsulated with one (1) of the four (4) following approved PCB encapsulants: Sikagard 62, Sikagard 670W, Sikadur 35, or BASF Sonoguard. Removal of the remaining exterior caulking and adjacent brick on the multi-level portions of the building not scheduled for renovation activities would result in significant safety concerns for the integrity of the building's remaining brick façade and could potentially compromise the building's overall structural integrity.

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The Kennesaw State University Foundation and The Winter Construction Co. certify that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at Kennesaw State University and are available for EPA inspection.

I appreciate your assistance on this matter. Please call me to discuss if you have questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Ralph Leprone", with a long horizontal flourish extending to the right.

Ralph Leprone  
Project Manager  
The Winter Construction Co.

Sincerely,

A handwritten signature in blue ink, appearing to read "Richard Corhen", with a long horizontal flourish extending to the right.

Richard Corhen  
Chief Operating Officer  
Kennesaw State University Foundation

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